5475 Kellenburger Road Dayton, OH 45424-1099 (51 3)233-8921 Fax: (51 3) 233-9004

December 14, 1992

Mr. Jerome E. Dennis, Chief Division of Standards Enforcement (HFZ-312) Office of Compliance and Surveillance Center for Devices & Radiological Health

1390 Piccard Drive

Rockville, MD 20850

Dear Mr. Dennis:

I am writing you in reference to the possible amendments to the part of t Center for Devices & Radiological Health

Laser Performance Standard. Amendment 3 under consideration considers a reduction in the emission duration to be used for I believe Class 1 lasers from 10,000 seconds to 100 seconds. that this is an excellent change to the standard. However, I do not understand why surveying instruments are being excluded from the change.

I cannot think of any situation where the surveying equipment that we sell would be viewed by a person for any length of time. The laser beam is intended to be only detected by an electronic detector. The contractor tends to set the equipment up above eye level to eliminate people from blocking the beam. regulations state that the contractor is responsible for placing the laser unit in operation above the heads of the employees, when possible.

I am not familiar with any "surveying equipment" that exposes the user to long durations of laser light. I feel that it unnecessarily restricts the laser surveying industry by maintaining this excessive exposure limit.

In general, I am pleased with the changes being proposed by CDRH to reduce or eliminate the differences with IEC Standards. If you would like to discuss this further, please contact me at 513/233-8921, ext. 243.

Sincerely,

Michael H. Kidwell

Quality Assurance Manager

MHK/rlm



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Spectra-Physics

Spectra-Physics Laserplane, Inc. 5475 Kellenburger Road Dayton, OH 45424-1099



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